UNITED STATES DISTRICT COURT EASTERN DISTRICT OF TENNESSEE KNOXVILLE DIVISION

)
)
)
)
3:23-CV-00046-DCLC-JEM
)
)))
)
)
)
)
)
)

MICHAEL ATNIP AND CRAIG KELLEY'S JOINT OPPOSITION TO MOTION FOR LEAVE OF COURT TO FILE COMPLAINT AGAINST DEFENDANT IDEAL HORIZON BENEFITS, LLC D/B/A SOLAR TITAN USA

Come now Defendants Michael Atnip ("Mr. Atnip") and Craig Kelley ("Mr. Kelley", collectively with Mr. Atnip, the "Individual Defendants") and join in and incorporate by reference the Receiver's Statement in Opposition to Motion for Leave of Court to File Complaint Against Defendant Ideal Horizon Benefits, LLC d/b/a Solar Titan USA [Doc. 115] as its response to [Doc. 97]. Specifically, the Individual Defendants support the establishment of a claims filing and review process in order to determine the substance and validity of the consumer complaints filed in this matter.

WRIGHT, CORTESI & GILBREATH DARROWEVERETT LLP

BY: /s/ Stephan R. Wright

Stephan R. Wright (#031494)

2288 Gunbarrel Rd. Ste. 154/Box 247

Chattanooga, TN 37421 Telephone: (423) 826-6919 Facsimile: (423) 826-6929 swright@wcglegal.com Attorneys for Craig Kelley BY: /s/ James G. Atchison

Samuel C. Blink (#036400)

James G. Atchison (admitted pro hac vice)

Fifth Third Center

424 Church Street, Suite 2000

Nashville, TN 37219 (615) 651-7386

sblink@darroweverett.com jatchison@darroweverett.com

Attorneys for Richard Michael Atnip

BY: /s/ William C. Killian

William C. Killian (#002425) 801 Broad St., Suite 428 Chattanooga, TN 37402

(423) 265-8804

billikillian@cawpllc.com

Attorneys for Richard Michael Atnip

CERTIFICATE OF SERVICE

I do hereby certify that the forgoing document has been filed electronically. Notice of this filing will be sent by operation of the Court's electronic filing system to all parties indicated on the electronic filing receipt. Parties may access this filing through the Court's electronic filing system.

This 24th day of March, 2023.

BY: /s/ James G. Atchison